

BRADLEY S. MAINOR, ESQ.  
Nevada Bar No. 7434  
JOSEPH J. WIRTH, ESQ.  
Nevada Bar No. 10280  
ASH MARIE BLACKBURN, ESQ.  
Nevada Bar No. 14712  
**MAINOR WIRTH, LLP**  
6018 S. Fort Apache Road, Ste. 150  
Las Vegas, NV 89148-5652  
Tel: (702) 464-5000  
Fax: (702) 463-4440  
[ash@mwinjury.com](mailto:ash@mwinjury.com)  
*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JUANA A. CRUZ DE RAMIREZ, an  
individual,

Plaintiff

vs.

CARDENAS MARKETS, LLC aka  
CARDENAS, a foreign limited liability  
company; LAMANZA LLC, a domestic  
limited liability company; DOE  
MAINTENANCE COMPANY 1-10; DOE  
INDIVIDUALS 1-20; and ROE BUSINESS  
ENTITIES 1-20, inclusive,

Defendants

CASE NO.: 2:19-cv-00814-RFB-BNW

**[PROPOSED] STIPULATION AND  
ORDER TO EXTEND JOINT PRETRIAL  
ORDER DEADLINE (SECOND  
REQUEST)**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the Joint Pretrial Order deadline in the above-captioned matter. Good cause exists to extend the remaining deadline for the reasons explained below.

**A. Reasons For the Extension**

On March 22, 2021 a hearing was held regarding Defendant's Motion for Summary Judgment which was subsequently denied. The courts ordered that the parties submit their Joint Pretrial Order within thirty (30) days of said ruling. Recently, counsel conferred regarding an

1 extension of time to submit the parties' Joint Pretrial Order in this case. Counsel agree that  
2 additional time is needed in order to fully and properly identify portions of deposition transcripts  
3 intended to be used at the time of trial and provide objections regarding the same. Additionally,  
4 the parties are tentatively scheduled for mediation on June 7, 2021 in order to participate in  
5 meaningful negotiations.

6 As such, the May 13, 2021 deadline should be extended so that the parties are able to  
7 provide a proper Joint Pretrial Order to the Court and participate in meaningful settlement  
8 negotiations.

9 **B. Proposed Revised Pretrial Order Schedule**

10 The Joint Pretrial Order is due on May 13, 2021 and the parties are requesting the deadline  
11 be moved to June 18, 2021. This request for an extension of time is not sought for any improper  
12 purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of  
13 allowing sufficient time to adequately prepare their pretrial order to include portions of  
14 depositions in which the parties intend to use at the time of trial. Additionally, the extension of  
15 time will allow the parties to participate in meaningful settlement negotiations through mediation.  
16 The parties respectfully submit that the reasons set forth above constitute compelling reasons and  
17 good cause for the short extension.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

WHEREFORE, the parties respectfully request that this Court extend the deadline for submitting their Joint Pretrial Order from the current deadline as outlined above.

DATED this 13th day of April, 2021.

**MAINOR WIRTH, LLP**

*/s/ Ash Marie Blackburn*

BRADLEY S. MAINOR, ESQ.

Nevada Bar No. 7434

JOSEPH J. WIRTH, ESQ.

Nevada Bar No. 10280

ASH MARIE BLACKBURN, ESQ.

Nevada Bar No. 14712

**MAINOR WIRTH, LLP**

6018 S. Fort Apache Road, Ste. 150

Las Vegas, NV 89148-5652

*Counsel for Plaintiff*

DATED this 13th day of April, 2021.

**WILSON ELSEER MOSKOWITZ**

**EDELMAN & DICKER, LLP**

*/s/ Michael Lowry*

MICHAEL P. LOWRY, ESQ.

Nevada Bar No. 10666

300 South 4<sup>th</sup> Street, 11<sup>th</sup> Floor


Las Vegas, NV 89101-6014

*Counsel for Defendants*

**ORDER**

IT IS SO ORDERED.

DATED this 18th day of May, 2021.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**